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NMWMP - Hanford 0042283

*Nez Perce*

AUG 14 1995

Kennewick

## ENVIRONMENTAL RESTORATION &amp; WASTE MANAGEMENT

P.O. BOX 365 • LAPWAI, IDAHO 83540-0365 • (208) 843-7375 / FAX: 843-7378

File Name \_\_\_\_\_

Integrated \_\_\_\_\_

RCRA \_\_\_\_\_

CERCLA \_\_\_\_\_

WQ \_\_\_\_\_

AQ \_\_\_\_\_

Administrative \_\_\_\_\_

EFSEC \_\_\_\_\_

N-Reactor \_\_\_\_\_

Miscellaneous \_\_\_\_\_

Cross reference \_\_\_\_\_

August 8, 1995

Gary Freedman, Unit Manager  
Washington State Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336-6018

Dear Mr. Freedman:

The Nez Perce Tribe Department of Environmental Restoration and Waste Management (ERWM) has received and reviewed a copy of **Proposed Plan for the 100-IU-1, 100-IU-4, 100-IU-3, and 100-IU-5 Operable Units, Hanford Site, Richland, Washington,; DOE/RL-95-60, Rev. 0.** The Nez Perce ERWM has provided comments, included in this letter.

Since 1855, reserved treaty rights of the Nez Perce Tribe in the Mid-Columbia have been recognized and affirmed through a series of Federal and State actions. These actions protect the interests of the Nez Perce to use their usual and accustomed resources in the Hanford Reach of the Columbia River and elsewhere. Accordingly, the Nez Perce Tribe ERWM has the support of the U.S. Department of Energy (DOE) to participate in and monitor certain DOE activities. The Nez Perce Tribe ERWM program responds to documents calling for comments from DOE.

The Nez Perce Tribe strongly supports the cleanup of the Hanford region with actions such as these which will reduce soil and groundwater contamination. Here are some suggestions regarding the above referenced document, site characterization and cleanup at the operable units:

- 1) It appears that site characterization and cleanup at the Riverland Rail Yard (100-IU-1 Operable Unit) has been aggressive. To make the characterization at the site complete, the plan should be revised to include another monitor well. On page 4, first column, fifth paragraph, this plan states that two monitor wells have been installed down-gradient of the former maintenance shop. How can the direction of groundwater gradient be known without at least three monitoring wells? To be sure that contamination did not escape to groundwater it is essential to sample down-gradient for diesel fuel and radionuclides.



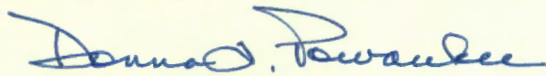
- 2) On page five, column one, third paragraph, it is stated that the 100-IU-3 Operable Unit on the Wahluke Slope was deactivated between 1960 and 1961 and razed in 1974. Underground installations were open on the site till 1974, and they were back-filled and leveled at that time. How has environmental characterization of the back-filled underground installations been accomplished at the 100-IU-3 Operable Unit?

The Nez Perce Tribe concurs with the preferred alternative of no further action for Operable Units 100-IU-4 and 100-IU-5. The Nez Perce Tribe withholds concurrence for the preferred alternative of no further action for Operable Units 100-IU-1 and 100-IU-3 contingent on the answers to the above questions.

The Nez Perce Tribe ERWM office appreciates the opportunity to provide comments on **Proposed Plan for the 100-IU-1, 100-IU-4, 100-IU-3, and 100-IU-5 Operable Units, Hanford Site, Richland, Washington,; DOE/RL-95-60, Rev. 0.**

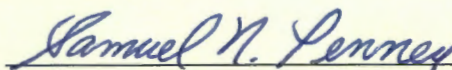
If you wish to discuss Nez Perce ERWM's comments further please contact ERWM's technical staff at (208) 843-7375.

Respectfully submitted,



Donna L. Powauke  
ERWM Manager

In Concurrence:



Samuel N. Penney, Chairman  
Nez Perce Tribal Executive Committee

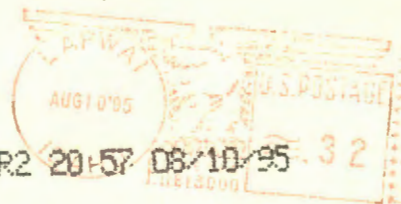
cc: John Wagoner, DOE-RL, Site Manager  
Kevin Clarke, DOE-RL, Indian Programs Manager  
Steve Alexander, Ecology, Perimeter Areas Section Manager  
Douglas Sherwood, EPA, Hanford Project Manager



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